

**CONTINUATION OF APPLICATION FOR A CRIMINAL COMPLAINT**

I, Meredith Stanger, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**INTRODUCTION, AGENT BACKGROUND, AND PURPOSE OF THE COMPLAINT**

1. The facts of this case, as more fully detailed below, reveal that on or about March 21, 2022, the user of Kik account “**domfamman**” (Display name: M D), and identified as **ROBERT DUANE WICKE**, will travel by vehicle to Grand Rapids, MI from Lansing, MI, to engage in sexual activities with two minors. Specifically, WICKE believes he will be engaging in sexual intercourse with a 7-year old girl and 9-year-old girl on March 21, 2021. This crime was facilitated via the use of the Internet with communication beginning in December of 2021.

2. I am familiar with the information contained in this continuation based upon the investigation I have conducted and based on information provided to me by other law enforcement officers.

3. The facts in this continuation come from my personal observations, my training and experience, and information obtained from other agents and witnesses. Since this continuation is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause.

4. I am currently employed as a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since January of 2015. I am currently assigned to the FBI San Francisco Field Office, Oakland Resident Agency, to a squad that investigates crimes against children. Since joining the FBI, I have investigated, among other things, federal criminal violations related to child pornography and the sexual exploitation of minors. I am currently

assigned to investigate cases involving the sexual exploitation of minors, including such exploitation via the Internet and computers. I have received training in the areas of child pornography, child exploitation, and human trafficking, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in multiple forms of media, including computer media and cellular and smartphone devices. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

5. This continuation contains information necessary to support a finding of probable cause to charge ROBERT DUANE WICKE for violations of 18 U.S.C. § 2422(b), 18 U.S.C. § 2423(a), and 18 U.S.C § 2252A(a)(2). Title 18 U.S.C. § 2422(b) makes it a crime to knowingly persuade, induce, entice, or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so. Title 18 U.S.C. § 2423(a) makes it a crime to transport a minor in interstate commerce for the purpose of engaging in illicit sexual conduct, or attempts to do so. Title 18 U.S.C § 2252A(a)(2) makes it a crime to knowingly receive or distribute or attempting or conspiring to receive or distribute, any visual depiction of child pornography.

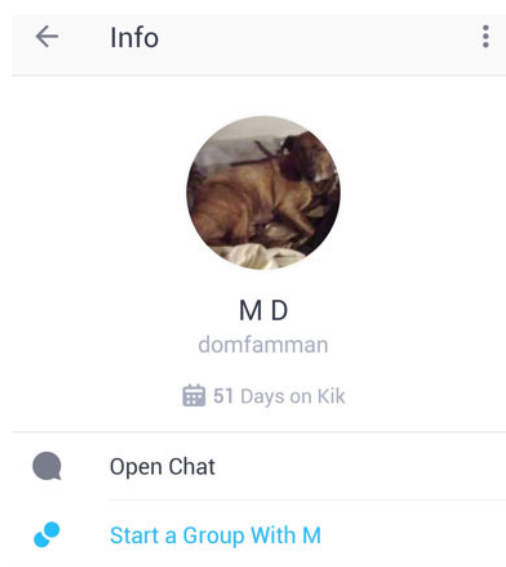
6. It is a criminal sexual conduct in the first degree to engage in sexual penetration with another person who is under 13 years of age, in violation of Michigan penal code § 750.520b. “Sexual penetration” means sexual intercourse, cunnilingus, fellatio, anal intercourse, or any other intrusion, however slight, of any part of a person’s body or of any object into the genital or anal openings of another person’s body, but emission of semen is not required. It is criminal sexual conduct in the second degree to engage in sexual contact with another person who is under 13 years of age, in violation of Michigan penal code § 750.520c. “Sexual contact” includes the

intentional touching of the victim's or actor's intimate parts or the intentional touching of the clothing covering the immediate area of the victim's or actor's intimate parts, if that intentional touching can reasonably be construed as being for the purpose of sexual arousal or gratification, done for a sexual purpose.

7. All grammatical errors in the quoted communication between WICKE and a law enforcement officer acting in an online undercover capacity detailed in this continuation are from the original communication.

### **FACTUAL BACKGROUND OF INVESTIGATION**

8. On or about December 6, 2021, a law enforcement officer acting in an online undercover capacity (OCE) entered the Kik public group "Daughgiveaway" with public hashtag (#daugiveaway). The OCE maintained an undercover account on Kik that described the OCE as a "(not so good) momma" in her mid-30s. Within this group, the OCE posted about having two purported minor daughters, ages 7 and 9 years old. On December 6, 2021, Kik user **domfamman**, who was already a member of this group, then engaged the OCE in personal messaging. domfamman was a Kik user for 51 Days as of December 6, 2021.



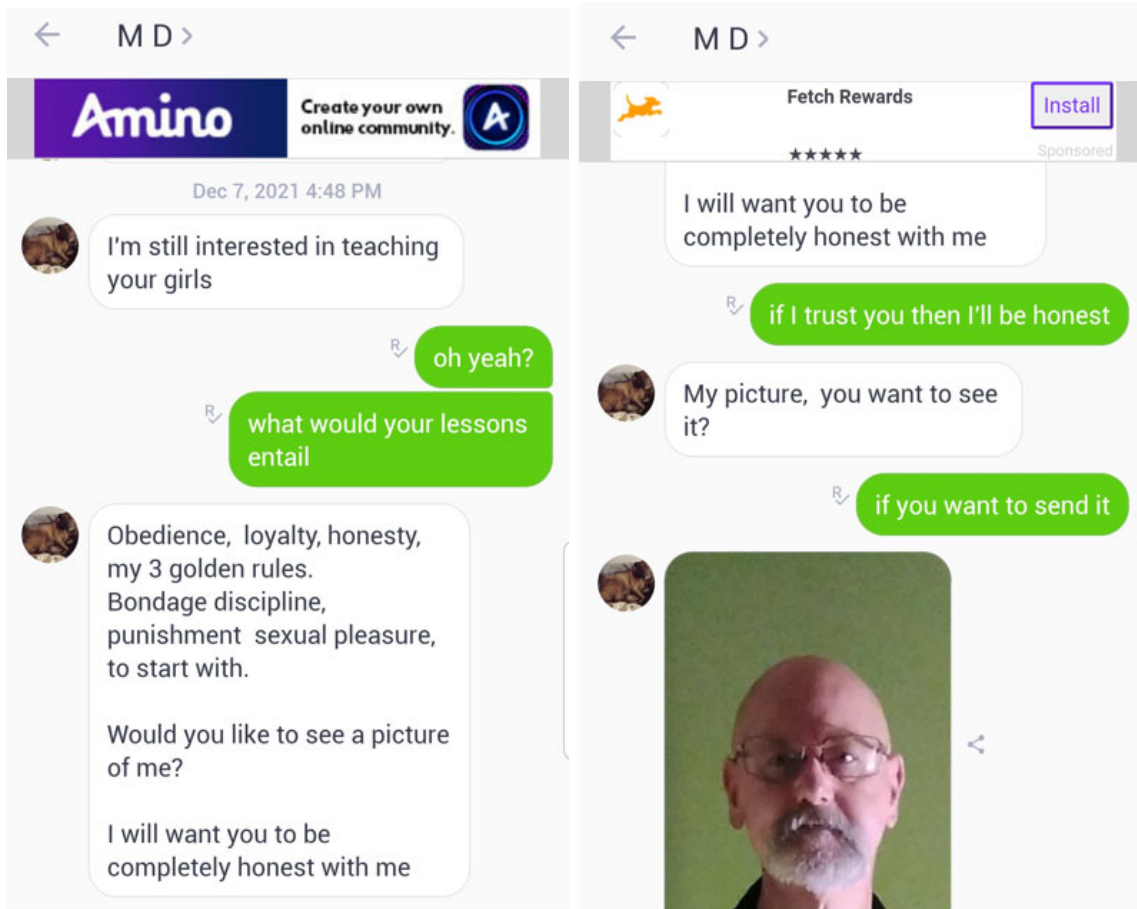
9. Kik user domfamman identified himself as a 59-year-old male named "Bob" from Michigan. domfamman confirmed that the OCE had two kids and that their ages were 7 and 9. domfamman wanted to know the gender of the kids and whether they were "submissive." domfamman told the OCE he was "looking for a special family."

10. domfamman provided that he has a grown-up daughter but was not hands-on with her as he made an agreement with her "to keep her out of it since she moved out for special reasons that I can't disclose." When asked what made him interested in kids, domfamman replied "Adult chat rooms way back when I thought I was chatting with 18 and older but turned out wrong."

11. domfamman said he wants to be hands-on "with the right ones." domfamman provided that he "started at 7 tying up the neighborhood girls." domfamman said he would use bondage and teach the OCE's purported young girls everything.

12. domfamman said that the OCE could send the girls to him for a certain time period or he could drive and pick them up. With the OCE living in California, domfamman commented "Long distance, be a 2-day drive."

13. On December 7, 2021, domfamman said he was still interested in teaching the OCE's purported minor children. The following conversation ensued:



14. domfamman said he started to learn to work with girls when he was around age 7. When domfamman began training girls when he was younger, he said the girls were mostly his age or younger and then as an adult, they were teenagers and some preteens. domfamman then taught his friends' daughters to obey him and their parents. The OCE would be the first parent to send any daughters for teaching.

15. domfamman said he could probably drive to get the OCE's purported minor girls after the new year. domfamman said San Francisco area was 2,330 miles away and would take 35 hours to drive. domfamman initially asked if he could stay with the OCE for a few days in California.

16. domfamman provided that he does not have WhatsApp but does have Hangouts and Wickr. domfamman said Wickr was the most secure one and his username was "K1bear."

17. On January 10, 2022, domfamman asked what the OCE was thinking about for the training of the OCE's purported minor daughters and meeting domfamman by Spring timeframe. The following conversation ensued:



18. domfamman initially said that he would help the OCE purchase flights and that the OCE would be the only one to need a round trip. domfamman said the OCE could fly into Detroit or Chicago as both were the same distance of where he lived now.

19. domfamman thought the OCE's purported children were 6 and 8 years old, but the OCE reminded him they were 7 and 9 years old. domfamman asked the girls' names to which the OCE provided Bella (9yo) and Anna (7yo).

20. On January 17-18, 2022, domfamman said he bought a new vehicle, an old truck. domfamman sent the OCE a photo of his "new old truck" which appeared to be a green Chevy truck with Timberline A/T Dayton tires. As stated in paragraph 89, the picture matches the description of the vehicle registered to WICKE.



21. domfamman wanted to know how long he could keep the OCE's purported minor daughters. domfamman said they could stay until he could teach them everything. domfamman referred to the OCE's purported girls as his "properties." domfamman wanted the OCE to talk to the OCE's purported minor daughters about the life they would have with domfamman. domfamman said the OCE would be proud how the girls turn out as "slave daughters."

22. On January 20, 2022, domfamman told the OCE that he was on disability and does jobs for cash like scrap and clean-up, "resale stuff" at consignment auctions.

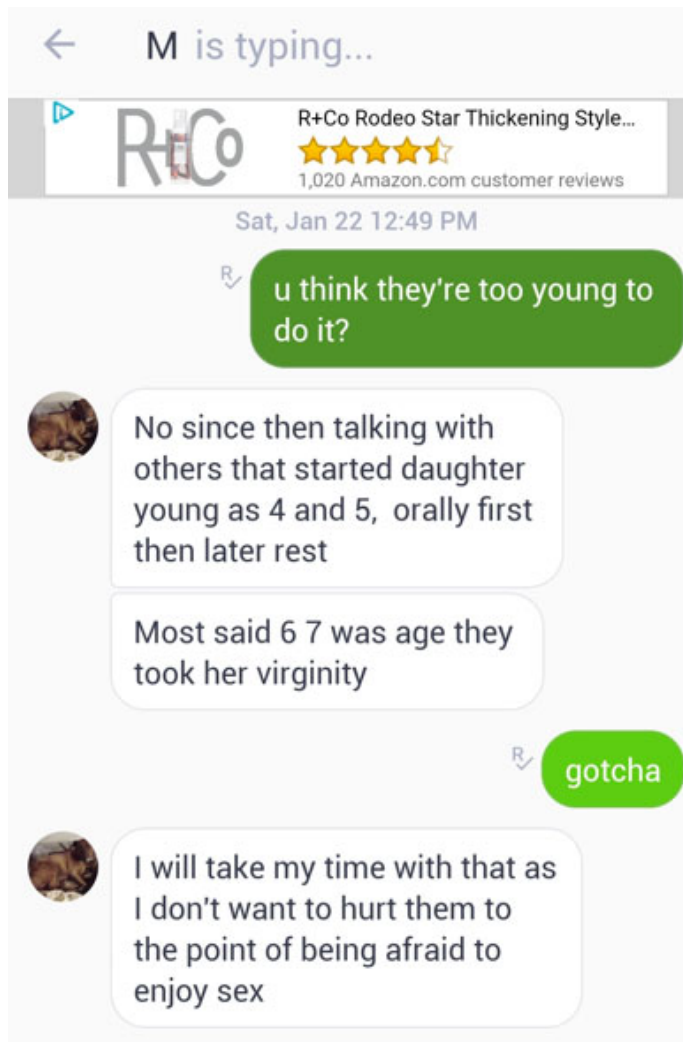
23. On January 21, 2022, domfamman was asked if he trained with videos. domfamman said some "oral, vaginal to start...progress to anal and plain bondage." domfamman said, "I call bondage the 'tying up game' for younger girls." domfamman said he could get some "safe" videos and send them later.

24. domfamman said it would be better to send videos via Wickr or Google Hangouts and provided his Google Hangouts as "Dancinbear014@gmail.com." domfamman advised the OCE that "Kik likes to permanently ban people who gets reported too often, happened to me couple years ago and took me months to get back on."

25. Later on January 21, 2022, domfamman sent the OCE four videos, two of which were consistent with child sexual abuse material (CSAM). The first video depicted an age difficult female orally copulating a male's penis. The next video depicted an age-difficult female having a male ejaculate into her mouth. The third video was consistent with CSAM depicting a prepubescent female exposing her genitalia. The fourth video was also consistent with CSAM depicting an adolescent female digitally penetrating her vagina. domfamman later provided that the third video was a random video someone sent him and the fourth video was a 15-year old female that he met and was currently chatting with on Kik.

26. domfamman said the youngest girl he has trained was 13 years old. The OCE asked domfamman if he thought the OCE's 7 and 9-year old purported girls were too young. The following conversation ensued:



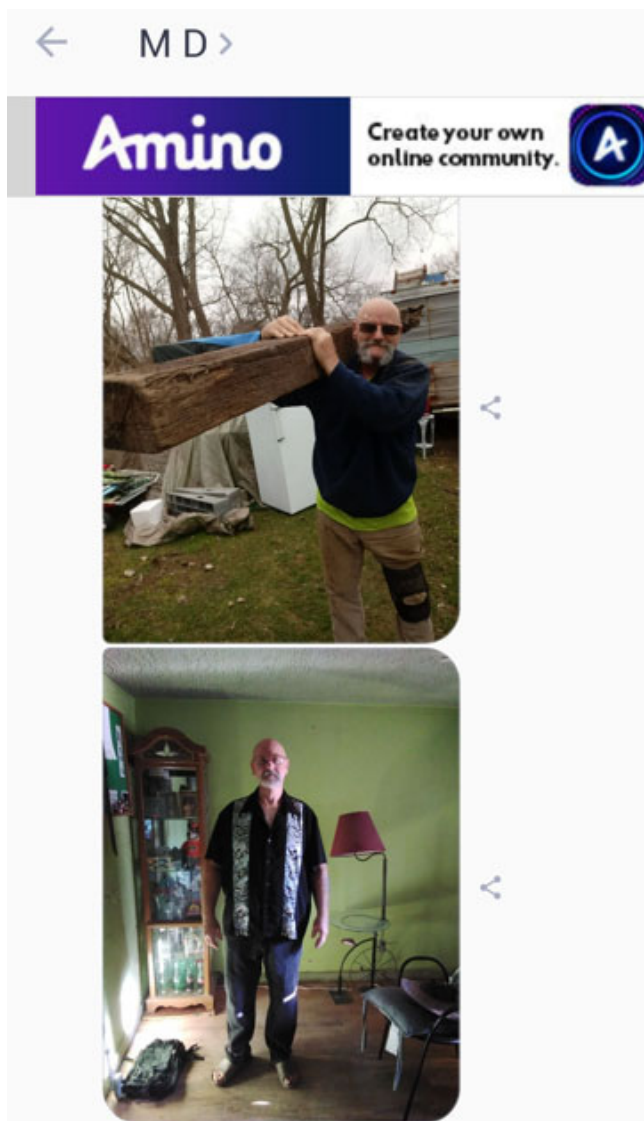


27. On January 24, 2022, domfamman wanted to know other activities the girls liked to reward them. The OCE mentioned Disney coloring books and Starburst candies. domfamman said "I think I know how to get them to suck my cock." domfamman wanted to know if the OCE's purported minor girls have seen snow and have any winter gear. domfamman asked what the girls' sizes were to buy them winter gear before it was all gone from stores. domfamman was told the girls' favorite colors were pink and purple.

28. On January 25, 2022, domfamman then sent the OCE seven images of what appeared to be females of various ages bound in various ways. One of these images was consistent

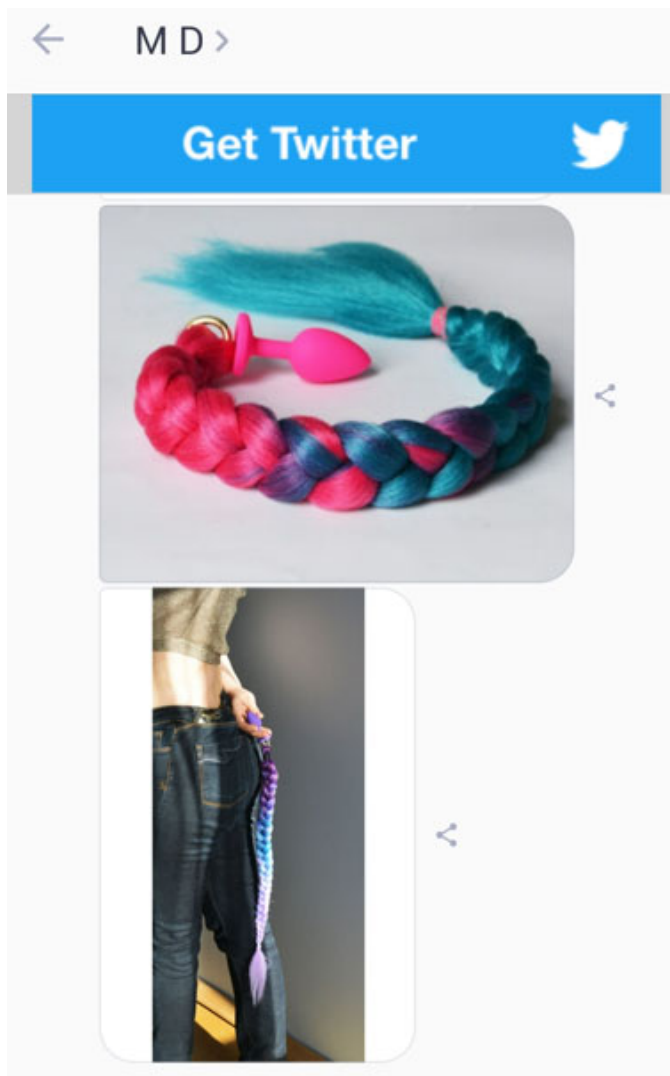
with CSAM depicting an adolescent female completed naked (aside from black shoes) with her wrists bound by red rope and her arms held above her head by a mechanism attached to the ceiling.

29. domfamman wanted to know what the OCE's purported minor girls thought about the images and videos and then asked what the girls thought of him. domfamman sent the OCE two pictures of a bald white male with white/gray facial hair (mustache and goatee). The male was wearing glasses in one photo and sunglasses in the other. As stated in paragraph 86, the person depicted in these pictures look like WICKE as he appears in his driver's license picture.



30. On January 28, 2022, domfamman asked if the OCE looked up flights to bring the OCE's purported minor daughters to where domfamman lived. domfamman said either Chicago or Detroit airports would work, but Detroit was closer to him.

31. On January 31, 2022, domfamman then asked if the OCE's purported minor daughters would like a "unicorn tail." domfamman sent the OCE two photos of what appeared to be pink/purple/teal-colored braids. In one photo the multi-colored braid was attached to a pink butt plug which domfamman said was "a beginner unicorn tail, small butt plug." The other photo was a multi-colored braid attached to the jeans of an age-difficult female's butt.

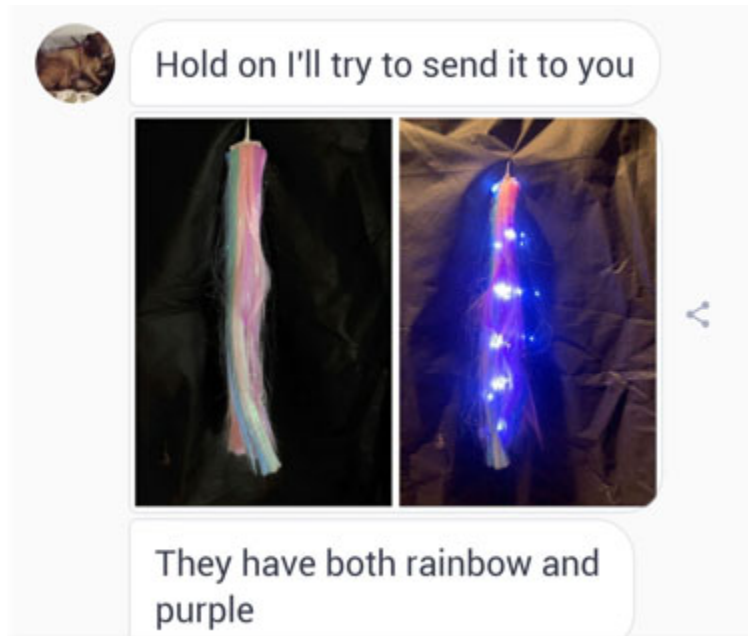


32. domfamman sent the OCE a photo of what appeared to be headbands with unicorn horns attached to them with the caption "And a unicorn horn?" The unicorn horns were rainbow-colored and silver-colored. domfamman said he would order them the following day and asked if he should buy each of the girls the same one or one of each color. domfamman said he would look at the tail and see if there were different colors for that as well.



33. domfamman said he would get the rainbow-colored horn for Anna, the OCE's purported 7-year-old. domfamman then said that there was an LED light unicorn tail plug. domfamman asked what the favorite color of the OCE's purported 9-year-old daughter, Bella. The

OCE said purple. domfamman said the tails do not have the plug on them. domfamman sent the OCE a photo of what appeared to be an unlit LED rainbow tail (on the left) and a lit purple tail (on the right).



34. domfamman then said he wanted the girls to wear dresses and "no panties" when they came to him. domfamman said he would try to have the tails and horns by then to put on the girls. domfamman asked what the girls thought of the pictures of him. domfamman also asked what the OCE thought of him. The OCE reminded domfamman that the OCE was not looking for anything.

35. domfamman told the OCE that he thought the OCE was trying to find a permanent home for the OCE's purported minor daughters because the OCE was in trouble. domfamman asked if the OCE would relocate to be closer to them if they wanted to stay with domfamman. The OCE asked if domfamman was in any trouble. domfamman replied, "No not into any trouble."

36. On February 9-10, 2022, domfamman said anytime in March would work as long as he does not find a new home. domfamman said his birthday was March 23rd. As stated in paragraphs 86-87 this date of birth is the same day as WICKE's.

37. On February 15, 2022, domfamman said that he gets mad at those people who have ruined the image of this type of life. domfamman asked for more pictures of the OCE and OCE's purported minor daughters showing "face and body."

38. On February 16, 2022, domfamman asked if the OCE found a cheap flight yet and confirmed if the OCE was coming with the OCE's purported minor girls for a week. The OCE said the OCE would stay at a hotel and the girls would stay with domfamman at his house. domfamman then suggested he get a hotel near the airport for a week.

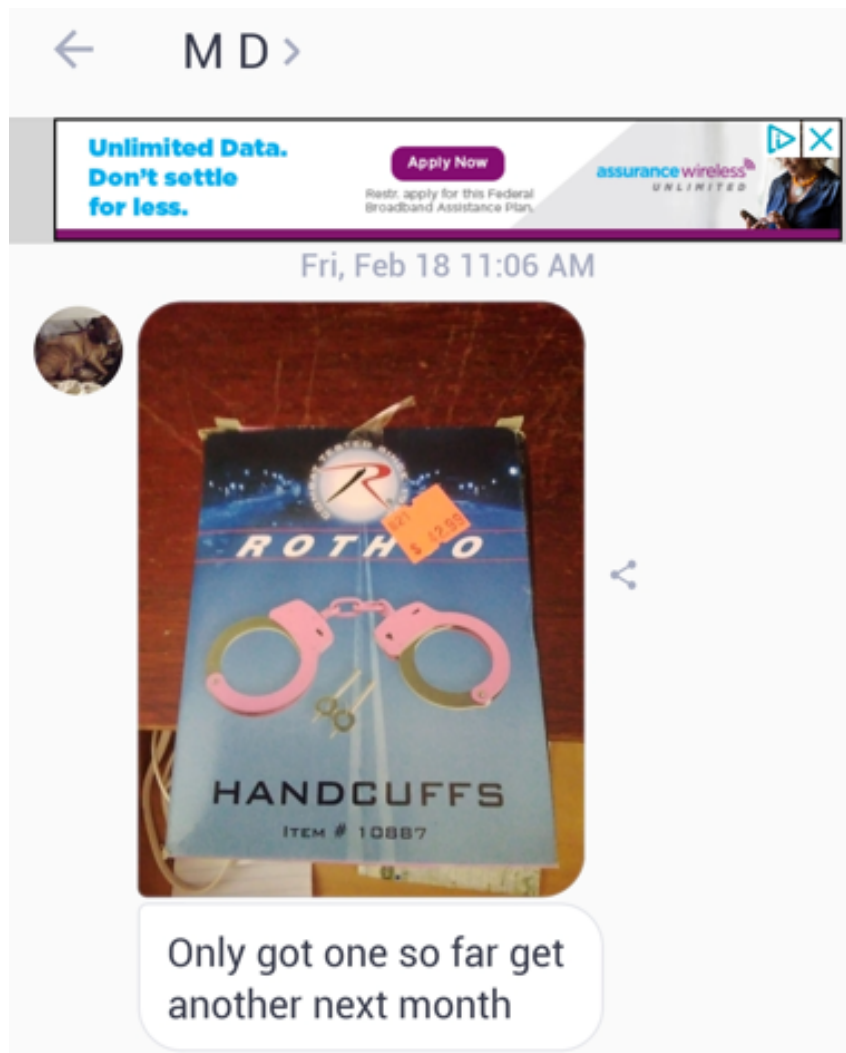
39. domfamman asked the OCE to look at flights to Grand Rapids, MI because he preferred not staying in either Detroit or Chicago. domfamman said he would look for hotels and asked if the girls wanted one with a pool.

40. domfamman said that he could not find winter things for the girls but would get the unicorn plugs and horns. The OCE suggested rain boots to which domfamman confirmed the girls' sizes as 4 and 5. domfamman said he would get them high-top shoes if he couldn't get boots. domfamman confirmed the girls like pink and purple.

41. On February 17, 2022, domfamman told the OCE that he was going to get gifts for the OCE's purported minor daughters, "mostly sex toys." domfamman wanted each girl to get their own sex toys to play with.

42. domfamman suggested the OCE come the week of March 19th through 26th. domfamman said the "Week of my birthday would be awesome if okay with you." domfamman said he would reserve the hotel when the OCE has the flight tickets.

43. On February 18, 2022, domfamman sent the OCE a photo depicting ROTHCO pink handcuffs. When the OCE said that the OCE would show the girls, domfamman said "Don't show them, I am going to get multiple items for them to unwrap." domfamman said he would send pictures of everything he gets for the girls.



44. On February 21, 2022, OCE sent domfamman several flight prices for Grand Rapids. domfamman asked if the OCE was okay with a suite or connecting rooms for the hotel. domfamman wanted pictures of the OCE and the OCE's girls so he knew what they looked like getting off the plane. domfamman asked what size swimsuits the girls wear so he could buy them new ones.

45. domfamman said that he would be gentle with the OCE's purported minor daughters "but they will be trained to be completely obedient as slaves." On February 23, 2022, domfamman suggested the OCE come for maybe four days, Monday through Thursday, because he could not afford a week for two rooms at a hotel.

46. domfamman told the OCE "See if you think this video you might want to share with them, I just got it yesterday." domfamman then sent the OCE a video consistent with CSAM depicting what appeared to be an adult male penetrating the vagina of a naked prepubescent female with his penis while another adult male is simultaneously putting his penis in the minor female's mouth. The video then depicts an adult male penetrating the anus of the same naked prepubescent female with his penis.

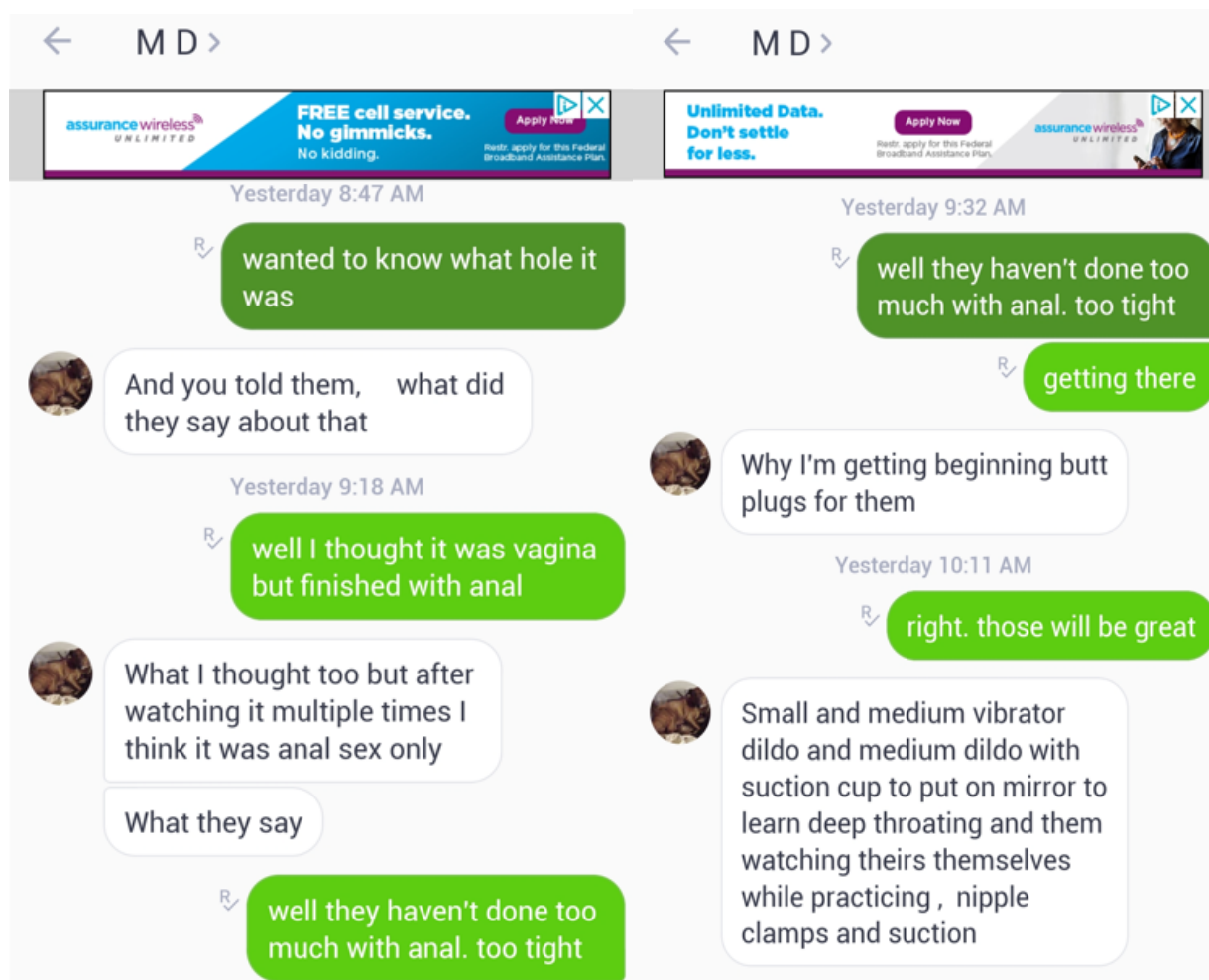
47. On February 24, 2022, the OCE asked where domfamman got the video. domfamman said he received the video from someone he met in a Kik group he was checking out. domfamman said "seeing a girl around their age enjoying sex will help." domfamman said he had another video that he thought the OCE would like, but did not think the OCE would want him to show the girls.

48. domfamman then sent the OCE a video depicting what appeared to be an adult feeding a baby in a high chair a spoonful of semen. domfamman commented that "according to the father, she usually takes it right from the source, but that weekend they had family visiting...Both parents are involved in teaching her."

49. The OCE asked if domfamman knew where the parents lived. domfamman said he messaged them but did not receive a response. domfamman said he checks out different groups on Kik to see what they are like. domfamman talks with a few Kik group members but stops talking to them if they are liars or not interested in what he wants.



50. On February 26, 2022, domfamman asked if the OCE's purported minor daughters liked the video of the young girl. On February 27, 2022, the OCE said the girls were unsure which hole the male was penetrating. The following conversation ensued:



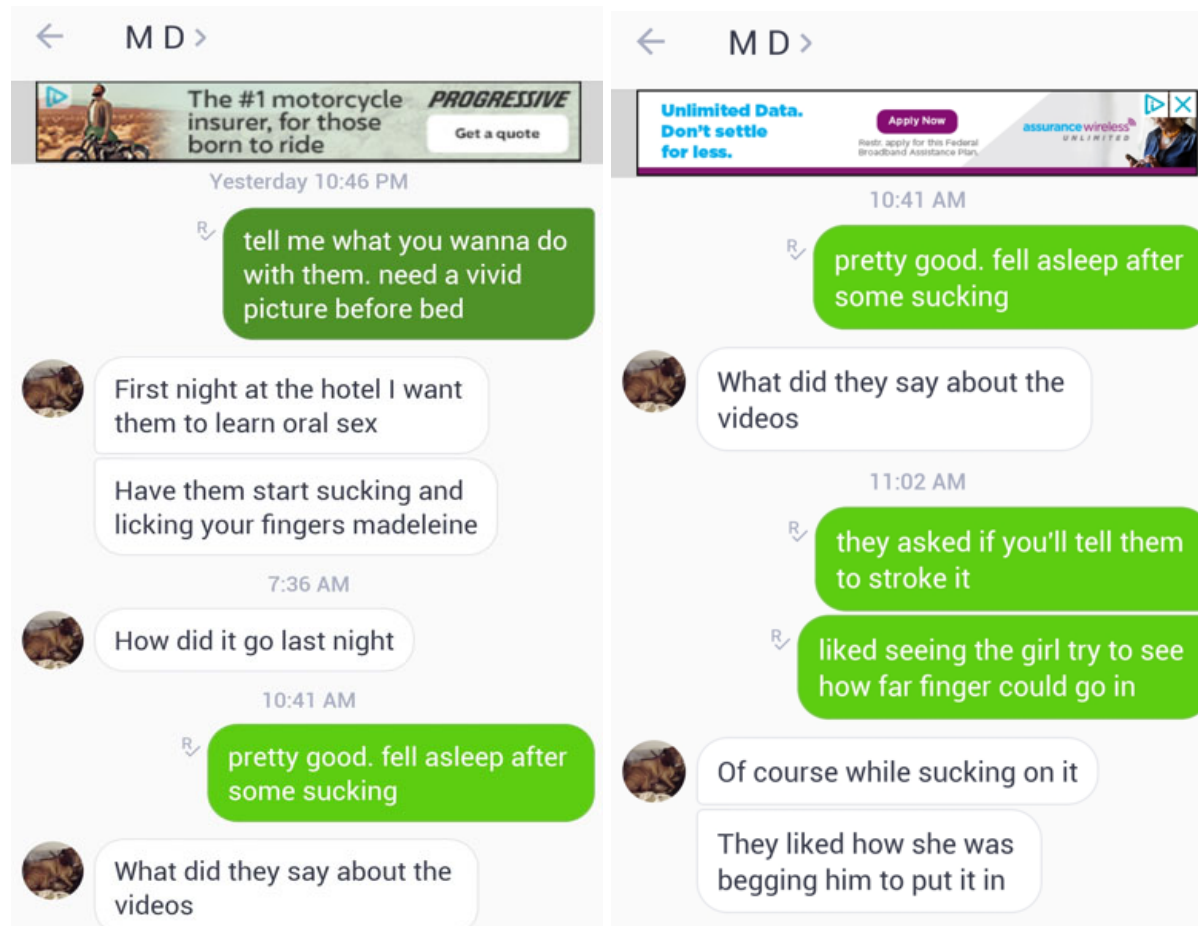
51. domfamman then told the OCE that he had some new videos. domfamman sent the OCE five videos consistent with CSAM. The first video depicted an adult male putting his penis into the mouth of a prepubescent female and ejaculating into her mouth. The second video depicted a minor female performing oral sex on an adult male. The male is then telling the young girl to "stroke it" with her hand and not just her mouth. The third video depicted an adult male having sex with a minor female. The fourth video depicted a prepubescent female digitally penetrating her vagina followed by an adult male digitally penetrating her vagina. The adult male then rubs

his penis on the outside of the girl's vagina and the girl tells him to "go in." The last video depicted a minor female performing oral sex on an adult male.

52. On February 28, 2022, the OCE and domfamman discussed the OCE and the OCE's purported minor daughters arriving on Monday, March 21<sup>st</sup>, around 6:00 PM. domfamman said that would be fine because he could check into the hotel to "take in my stuff and check the rooms out" as most hotels have a check-in time of 3:00 PM.

53. domfamman asked if the OCE bought a return ticket. domfamman said if "everyone is in agreement of me training the girls completely" then the OCE would be returning alone.

54. On March 1, 2022, the OCE asked what domfamman wanted to do with the OCE's purported minor daughters. The following conversation ensued:

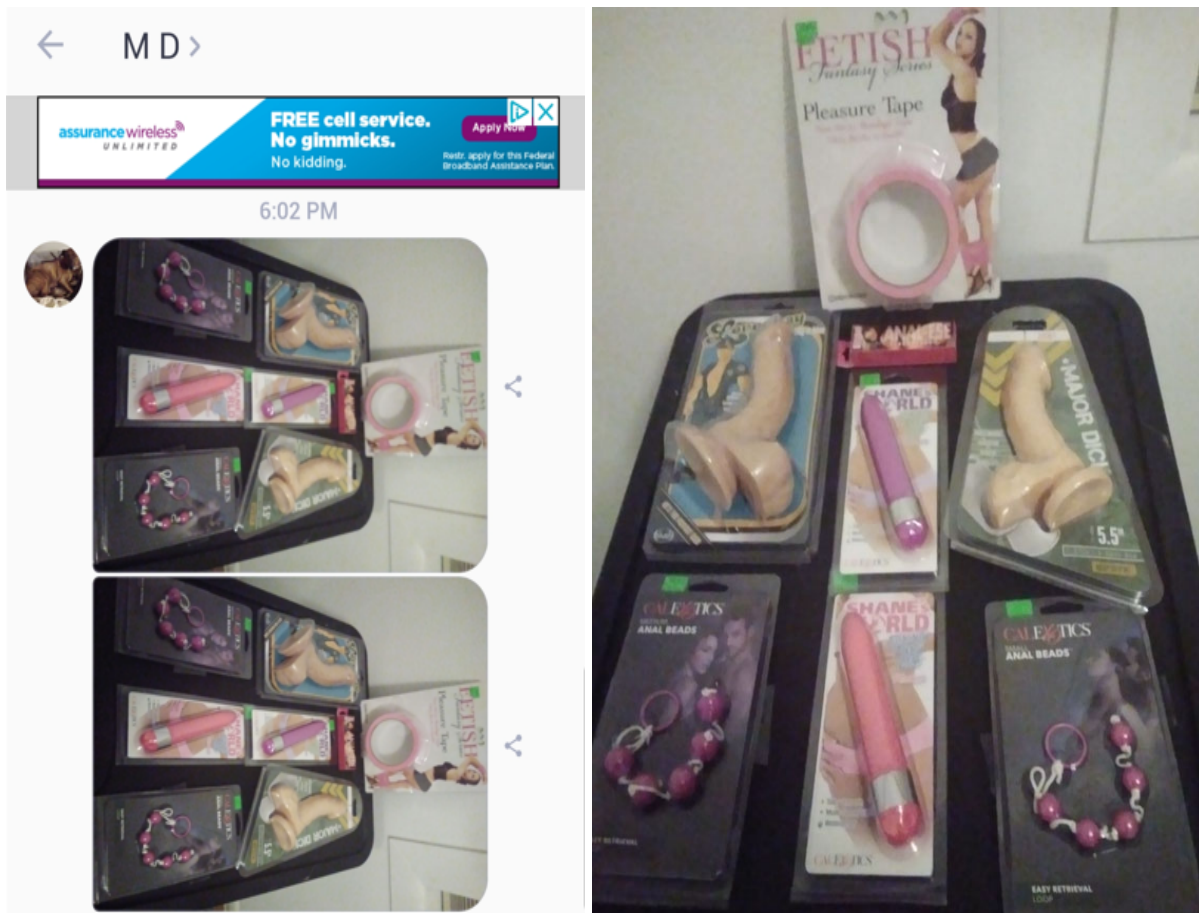


55. domfamman asked if the girls were "thrilled about being taught to be obedient girl slaves."

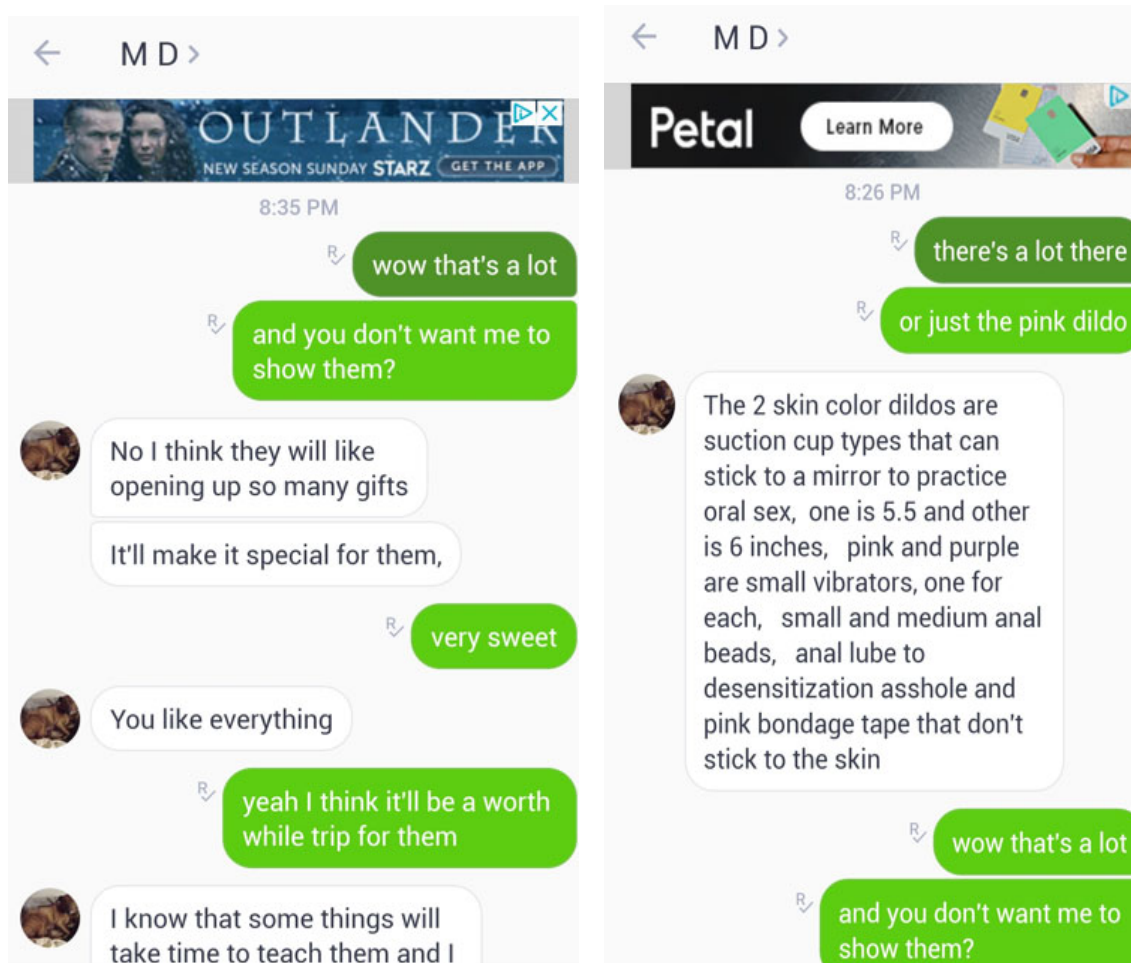
56. domfamman wanted the girls' clothing sizes to include shoe sizes again because he forgot to write them down. The OCE told domfamman the girls were youth small and medium and sizes 4-5 for kid shoes.

57. domfamman wanted the OCE to tell him when the flight tickets were booked so he could get the hotel rooms. domfamman also wanted a picture of the OCE and the OCE's daughters with faces. domfamman told the OCE there must be trust so he would be the one "to step up" and provided his email as: Dancinbear014@gmail.com for the OCE to send pictures.

58. On March 2, 2022, domfamman sent the OCE photos of what he bought for the OCE's purported minor daughters. domfamman sent pictures of the following:



59. The following conversation ensued with domfamman explaining each item:



60. domfamman told the OCE that he would buy the girls swimsuits the next day. domfamman then asked the OCE "what do you think they will say when they go swimming with their anal beads up inside their butt holes[?]" domfamman said that "Whenever we go out, they will be required to have them inserted until we get back to the hotel or home if they stay...Discipline training."

61. The OCE told domfamman that flights were booked for the 21st to arrive in Grand Rapids just after 6pm. domfamman said "Great I will get the hotel asap." domfamman wanted photos sent to his email.

62. On March 3, 2022, domfamman asked for the flight number. The OCE sent a screen capture of a Kayak flight itinerary from SFO-GRR for Delta flight 2751/2518, departing San Francisco, CA at 8:00 AM and arriving in Grand Rapids, MI at 6:08 PM. domfamman said he would get the hotel the next day.

63. On March 4, 2022, domfamman told the OCE that he booked two rooms and one was in the OCE's name. domfamman requested the rooms as close as possible.

64. On March 5, 2022, domfamman sent the hotel information as the Country Inn by Radisson. domfamman then sent the OCE four photos of two little girl bathing suits. Both suits were two-piece bikinis, one pink in color with a white flower and the other teal in color with multiple tropical flowers/plants. domfamman wanted the OCE to know they were two-piece suits and that the pink one was for Anna, and the other suit had some purple in it for Bella. domfamman said he bought small suits because they were for 6-7 and the medium was for 10.

65. On March 5-6, 2022, domfamman specified "When you fly, dresses only, shoes and coats, today got to 60 degrees...1 bag of clothes mostly dresses, skirts, front button or zipper tops and shoes and they will be allowed 1 item that will help them with being with me, stuffie or blanket...1 pair of pants and shorts."

66. On March 7, 2022, domfamman told the OCE "And be sure to tell them that they must tell anyone who asks where they are going to say grandpa's to stay for the summer...Tell them that they must say they are home school so grandpa can help them while there."

67. The OCE wanted to specify which hotel it was. domfamman confirmed it was the Country Inn and Suites by Radisson by the airport on 28th street.

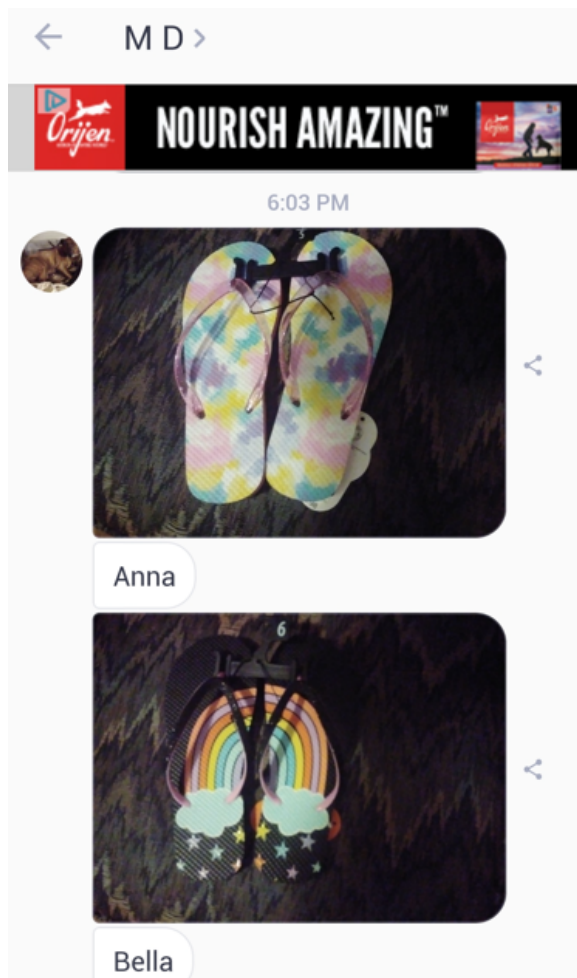
68. domfamman reminded the OCE that the girls should bring dresses, shoes, and coats, but nothing else "meaning no panties."



69. domfamman told the OCE that the girls would be together with him on his birthday "23rd". On March 8, 2022, the OCE asked domfamman if he was clean and had been tested before. domfamman informed the OCE that he has diabetes and had cancer 10 years ago. domfamman gets blood work often and his last relationship was six years ago so he believes he is clean.

70. domfamman told the OCE to start letting the girls be nude around the house and when they go out to have the girls go out "without panties on."

71. On March 9, 2022, domfamman sent the OCE two photos depicting what appeared to be girl sandals in tie-dye and rainbow colors. domfamman specified one pair for each of the OCE's purported minor girls.



72. domfamman then sent the OCE a video consistent with CSAM depicting what appeared to be an adult male ejaculating into the mouth of a minor female. domfamman said the video was “just random from a group.” domfamman thought the OCE might want the OCE’s purported minor girls watch it.

73. On March 11, 2022, domfamman asked if the OCE wanted a photo of his “soft cock” to show the OCE’s purported minor girls. domfamman then sent an image of what appeared to be an adult male’s penis. domfamman followed the photo by saying “I know they will have a hard time cause of the thickness.” The OCE said that domfamman would have to easy into it, especially if he wants to perform anal sex on the girls. domfamman replied, “Yes it will take time.” domfamman wanted to know if the OCE had a good excuse for the girls’ time away from school.

74. On March 15, 2022, domfamman asked if the OCE was ready for the following Monday. The OCE asked if domfamman would want to take videos of the girls as part of their training. domfamman replied, “Yes because I thought you would like to see how their training is going.” domfamman asked if the OCE wanted domfamman to keep records of it all.

75. When asked what domfamman would do with the sexual videos he takes, as videos are traded via the Kik application all the time, domfamman said, “I know, how do you think I got the ones I showed you, I have never sent anything that I have and I would not with any new videos I may make now...Only directly to your email address.”

#### **SUBPOENA TO KIK**

76. On January 4, 2022, SA Stanger served an administrative subpoena to Kik requesting basic subscriber information and IP activity related to user: **domfamman**. On January 18, 2022, Kik responded and provided the following information:

First Name: M, B, Bob  
Last Name: D, W, Wick

Email: specfamlife@gmail.com (unconfirmed)  
Registration Timestamp: 2021/10/18 03:12:51 UTC  
Device Type: Android  
Device Brand: Samsung  
Device Model: SM-T290  
User Location: US (ip: 108.207.62.236)  
User Location Timestamp: 2022/01/18 18:07:28 UTC  
Registration Birthday: 1962-03-22  
IP Addresses: 108.207.62.236, 148.59.89.58, 69.41.1.120

77. Via publicly available Internet research, IP address 108.207.62.236 was determined to be associated with AT&T Mobility, and IP addresses 148.59.89.58, 69.41.1.120 were determined to be associated with Daystarr Communications.

78. Via publicly available Internet research, a Samsung Android device, model SM-T290 resolved to a Samsung Galaxy Tab A 8.0, digital tablet.

#### **SUBPOENA TO GOOGLE**

79. On January 18, 2022, SA Stanger served an administrative subpoena to Google LLC requesting basic subscriber information and IP activity related to the account associated with Google identifier: **specfamlife@gmail.com**. On the same day, Google responded and provided the following information:

##### **Subscriber Information**

Google Account ID: 371439306124  
Name: Bob wick  
Given Name: Bob  
Family Name: wick  
Created on: 2021-10-18 03:02:47 UTC  
Terms of Service IP: 2600:1700:e7b0:3460:b93f:704a:eca4:bb0e  
Services: Gmail, Web & App Activity, YouTube  
Deletion Date: none provided  
Deletion IP: none provided  
Last Updated Date: 2021-12-28 01:03:44 UTC  
Last Logins: 2021-10-18 03:02:48 UTC

##### **Account Recovery**

Recovery e-Mail: none provided  
Recovery SMS: +15173030559 [US]



**Phone Numbers**

Signin Phone Numbers: +15173030559 [US]

2-Step Verification Phone Numbers: none provided

80. Via publicly available Internet research, telephone 517-303-0559 was determined to be associated with T-Mobile.

**SUBPOENA TO T-MOBILE**

81. On January 19, 2022, SA Stanger served an administrative subpoena to T-Mobile requesting subscriber and device information related to telephone **517-303-0559**. On the same day, T-Mobile Law Enforcement Relations Group provided the following information:

**Subscriber Information**

Customer Name: ROBERT WICKE

Subscriber Name: ROBERT WICKE

Service Address: 2335 COMMONWEALTH AVENUE, LANSING, MI 48906 USA

Billing Address: 2335 COMMONWEALTH AVENUE, LANSING, MI 48906 USA

Start Date: 10/14/2021

**Device Information**

IMSI: 310260136427302

IMEI: 357486359711890

82. Via publicly available Internet research, IMEI 357486359711890 resolved to a Samsung Galaxy A12 (SM-A125U) cellular device.

**SUBPOENA TO COUNTRY INN & SUITES BY RADISSON**

83. On March 14, 2022, SA Scott Robinson served an administrative subpoena to the Country Inn & Suites by Radisson, located at 5399 28th St Ct SE, Grand Rapids, MI 49546. The subpoena requested the guest manifest between March 20 and March 27, 2022.

84. According to the documents obtained from the Country Inn & Suites by Radisson, Robert WICKE had a reservation on file for March 21 through March 25, 2022.

85. The email address listed on the reservation was rwicke.277472@guest.booking.com with a phone number of 517-303-0599.

**IDENTIFICATION OF ROBERT DUANE WICKE**

86. Kik user **domfamman** identified himself as a 59-year-old male, named “Bob” and living in Michigan. **domfamman** sent several images purported to be him. **domfamman** also stated his birthday as March 23. All photographs appeared to be of the same individual and were compared with the driver’s license of Robert Duane WICKE (pictured below) with positive results.



87. The birthdate and age provided by **domfamman** also matched WICKE’s date of birth on his driver’s license. Records from the Michigan Secretary of State showed that WICKE’s driver’s license and vehicles registered at 2335 Commonwealth Avenue, Lansing, MI 48906.

88. A search of Accurant for Robert WICKE revealed a full name of **ROBERT DUANE WICKE** with an address of 2335 Commonwealth Avenue, Lansing, MI 48906. In 2006, WICKE was sentenced for possession of child sexual abusive material (CSAM). WICKE is a registered sex offender (severity 3) in the state of Michigan.

89. WICKE sent a photograph of a green truck that he claimed be recently purchased. FBI surveillance confirmed this vehicle at WICKE’s aforementioned Lansing address and

identified the truck as a green 1996 Chevrolet truck (with a green utility box on truck bed) bearing Michigan license plate DDJ8957, registered to Robert WICKE.

### **BACKGROUND ON KIK**

90. Kik Messenger (aka “Kik”) is an application-based communication service owned by MediaLab.ai Inc. and headquartered in Santa Monica, California. Kik’s Guide for Law Enforcement describes Kik as a free smartphone messenger application that lets users connect with their friends and the world around them through chat. Kik uses smartphone data plans or Wi-Fi connection to send and receive messages to other Kik users, bypassing SMS (short message service). The Kik application is primarily used on a smart device, such as an Apple iPhone, Android cell phone, Apple iPad, or Android Tablet. However, Kik can be used on any computing device utilizing an emulator that can make a computing device look like an Android device.

91. A main attraction of Kik that differentiates it from other messaging apps is its anonymity. To register for the Kik service, a user must enter a first and last name, e-mail address, birth date, and select a username; Kik does not verify the information an individual enters, meaning a user can create an account using a fake name, e-mail address, and birth date if s/he so chooses. Kik does not require a phone number for registration and uses usernames as the unique identifier. Usernames are unique and cannot be replicated. This affords users additional privacy. Although each username is unique, Kik users can create multiple accounts under different usernames tied to different e-mail addresses.

92. Kik members can only see other Kik members’ display names, usernames, and profile pictures. Kik Messenger allows for group chats with up to 50 participants and facilitates real-time video chat options, which allow for live one-on-one video chat or up to a six-person

private video chat. Chats on Kik Messenger are not viewable remotely. Chats are only viewable with the user's password and from the device the application is stored.

93. After setting up an account, the users can then post and share photographs and videos with other users on the platform. Users can also send a private message to other users and also send photographs or videos directly to another user. Kik also functions as a cloud service that stores messages, photos, videos, documents, and other files so users can access their data from any of their devices at any time without having to rely solely on local device storage or on third party backup storage. For this reason, a Kik user's content stored within the application, including stored messages, photos, and videos, may not be available within the specific application on an electronic device. All data stored within Kik is heavily encrypted.

#### **REQUEST FOR SEALING**

94. I respectfully request that the Court issue an order sealing, until further order of this Court, all papers submitted in support of this criminal complaint application, including the application, continuation, and arrest warrant. I believe sealing is necessary because premature disclosure of the contents of this continuation and related documents may jeopardize this continuing investigation by alerting the target and providing an opportunity to destroy evidence and/of flee.

### **CONCLUSION**

95. Based on the foregoing, there will be probable cause to believe that ROBERT DUANE WICKE committed violations of Title 18 U.S.C § 2422(b), 18 U.S.C § 2423(a), and 18 U.S.C § 2252A(a)(2), which makes it a crime to knowingly persuade, induce, entice, or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so; makes it a crime to travel in interstate commerce to engage in sexual conduct with minor or attempts to do so; and receive and distributed child pornography.